

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>REGINALD BALDWIN</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951 (conspiracy to interfere</b>
	<b>:</b>	<b>with interstate commerce by robbery - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 1951 (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying and using</b>
	<b>:</b>	<b>a firearm during a crime of violence - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of Forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, Diamond Hearts Jewelry Store, 404 South Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.
2. On or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**REGINALD BALDWIN**

and Rashaid Hamed and Daniel Baker, charged elsewhere, conspired and agreed together to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, in that the defendant, Hamed, and Baker agreed to unlawfully take and obtain currency and jewelry from a business engaged in interstate commerce, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their control, all in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

### MANNER AND MEANS

3. It was part of the conspiracy to rob Diamond Hearts Jewelry Store by use of force, threats of force and violence, and through the use of handguns.

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### OVERT ACTS

In furtherance of the conspiracy, defendant **REGINALD BALDWIN**, Rashaid Hamed, and Daniel Baker committed the following overt acts, among others, on or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania:

1. Defendant **REGINALD BALDWIN**, Rashaid Hamed, and Daniel Baker entered the Diamond Hearts Jewelry Store, located at 404 South Street in Philadelphia, PA, wearing black knit caps and a hooded sweatshirt to cover their faces, and gloves, brandishing firearms, and carrying a duffel bag.

2. While Rashaid Hamed stood by the door of the jewelry store and acted as a lookout, defendant **REGINALD BALDWIN** and Daniel Baker pointed guns at the store owner and employees and stole cash and over \$274,000 in jewelry, most of which they stuffed into the duffel bag.

3. During the robbery, one of the robbers fired a shot from his handgun at the jewelry store owner. As defendant **REGINALD BALDWIN**, Rashaid Hamed and Daniel Baker were making their getaway, the jewelry store owner fired return shots, which struck Hamed and Baker. Defendant **BALDWIN**, Hamed and Baker then fled from the jewelry store with the stolen cash and jewelry.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. On or about February 14, 2007, in the Eastern District of Pennsylvania,

defendant

**REGINALD BALDWIN,**

and Rashaid Hamed and Daniel Baker, charged elsewhere, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant **BALDWIN**, Hamed, and Baker unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, United States currency and jewelry valued at approximately \$274,973, belonging to Diamond Hearts Jewelry Store, from employees, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by pointing handguns at the employees.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and 2(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 14, 2007, in the Eastern District of Pennsylvania,  
defendant

**REGINALD BALDWIN,**

and Rashaid Hamed and Daniel Baker, charged elsewhere, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, handguns, during and in relation to a crime of violence for which defendant **BALDWIN** may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and the interference with interstate commerce by robbery, of Diamond Hearts Jewelry Store.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2(a).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Section 924(c)(1), set forth in this indictment, defendant

**REGINALD BALDWIN**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offense(s), including, but not limited to:

a 9mm Lugar, serial no. 050058

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**PATRICK L. MEEHAN**  
**United States Attorney**